

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

v.

CIVIL CASE NO. 3:20-cv-415-DPJ-FKB

REAL PROPERTY KNOWN AS
115 ROSEDOWNE BEND
MADISON, MISSISSIPPI 39110

DEFENDANT PROPERTY

JOINT MOTION FOR INTERLOCUTORY SALE OF PROPERTY

The United States of America and Theodore Marvin DiBiase, Jr. and Kristen DiBiase (the “DiBiases”), by and through their respective attorneys, move the Court for approval for an interlocutory sale of the Defendant Property, listed in the First Amended Verified Complaint [56], and commonly known as

115 Rosedowne Bend, Madison, Mississippi 39110 (20-FBI-003981).

This motion is brought pursuant to the parties’ Joint Agreement for the Interlocutory Sale of Property, attached as Exhibit A, in order to preserve and protect presently existing equity in the Defendant Property and to prevent foreclosure of the property by the lienholder.

The United States further asks that the stay in this case be temporarily lifted for the filing and consideration of this motion.

RESPECTFULLY SUBMITTED, this the 9th day of March 2023.

UNITED STATES OF AMERICA

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